

Spectra-kote.

P. O. BOX 369, GETTYSBURG, PENNSYLVANIA 17325-0369 • 717 334-3177

July 28, 1988

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Michael Towle
Remedial Enforcement Project Officer
U.S. Environmental Protection Agency, Region III
PA CERCLA Remedial Enforcement Section (3HW12)
P.O. Box 3409
Reston, VA 22091

Re: Keystone Sanitation Landfill
Adams County, Pennsylvania

Dear Mr. Towle:

We have received correspondence from Bruce P. Smith, Chief of the Hazardous Waste Branch for EPA Region III, concerning the Keystone Sanitation Landfill in Adams County, Pennsylvania. For your convenience, we enclose herewith a copy of Mr. Smith's letter, which is under date of June 28, 1988. The following will hopefully respond to the various requests for information contained in Mr. Smith's letter.

1. Spectra-Kote Corporation ("Spectra-Kote") is engaged in the business of applying ink and clay coatings to paper products for the corrugated industry.

2. Spectra-Kote conducts business Monday through Friday (except legal holidays) on a two-shift basis.

3. Spectra-Kote is wholly-owned by Tim-Bar Corporation, a Pennsylvania business corporation with offices located at 148 North Penn Street, Hanover, Pennsylvania 17331.

4. Spectra-Kote commenced operations in 1958. Since that time, the company has continually engaged in its present business operations. Processes used by the company include air knife coating, flexographic printing and gravure printing. All of the coatings and inks are water based products and are non-toxic and non-hazardous.

5. The raw materials used by Spectra-Kote in its operations include: rolls of kraft linerboard (purchased off site); soya proteins, latex, clay, titanium dioxide and salts of inorganic metals not considered toxic. A very small amount of liquid barium products and phenol are the only materials that are included in the EPA list, June 6, 1986, that is considered somewhat toxic. All of the rest of our raw materials are not considered toxic by EPA.

AR201155



P. O. BOX 369, GETTYSBURG, PENNSYLVANIA 17325-0369 • 717 334-3177

Michael Towle
Remedial Enforcement Project Officer
Page 2
July 28, 1988

6. The company has implemented safety precautions to assure that potentially hazardous waste products do not intermix with non-hazardous water wastes. Dryer machines are operating to de-hydrate ink wastes and by-products for safe off-site disposal. Powdered residue is currently shipped in drums to the Lanchester Landfill in Chester County, Pennsylvania, an approved landfill operation. Processed liquid waste is filtered and the effluent is accepted by the Gettysburg Municipal Authority.

7. Spectra-Kote has sent waste products to the Keystone Sanitation Landfill from 1960 through the present. From 1983 to present, only waste paper was sent to the landfill.

8. Spectra-Kote transported the following wastes to the Keystone Sanitation Landfill:

- A. Small amounts of waste sludge.
- B. Barrels of dried color from suppliers.

9. A variety of haulers was used over the years to transport waste. Some of the waste was transported in vehicles owned and operated by Spectra-Kote. Independent haulers included: Keystone Sanitation trucks.

10. Any estimate of the quantity of Spectra-Kote waste transported to the Keystone Sanitation Landfill would be speculation at this time. We are unable to locate documentary evidence indicating the total amount of gallons and/or tons delivered.

11. We have no records or documents regarding amounts of waste hauled. Spectra-Kote believed, and continues to believe, that none of the waste delivered to the site constituted "hazardous" waste.

12. We are including a Module 1 that we applied to DER to dispose of our waste which was not considered hazardous to Keystone Sanitation Landfill.

AR201156

Spectra-kote.

P. O. BOX 369, GETTYSBURG, PENNSYLVANIA 17325-0369 • 717 334-3172

Michael Towle
Remedial Enforcement Project Officer
Page 3
July 28, 1988

13. Spectra-Kote is unaware of any other person or entity, except as identified herein, who may have transported or disposed of waste at the Keystone Sanitation Landfill.

The parent corporation of Spectra-Kote, Tim-Bar Corporation, maintains umbrella insurance coverage that insures against losses associated with some aspects of hazardous waste disposal. The exact nature of the coverage is less than clear and may become the subject of litigation.

If any additional information is required to complete your investigation, please do not hesitate to contact the undersigned.

Very truly yours,

SPECTRA-KOTE CORPORATION

BY



Basil B. Benson, President

BBB/jc
Enclosure

AR201157